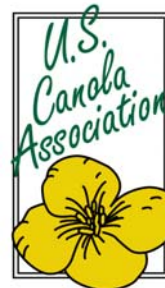


June 20, 2005

U.S. Food and Drug Administration
Department of Health and Human Services
Re: Docket No. 2004N-0463



Division of Dockets Management:

The U.S. Canola Association (USCA) appreciates the opportunity to comment on the Nutrition Facts Panel (NFP) and way in which calories are presented on it. The USCA represents domestic canola growers and fosters the cultivation and use of the crop. As canola oil is one of the healthiest vegetable oils in the marketplace, the USCA is focused on nutrition policy and the consumption of healthy fats in the American diet.

The USCA concurs with the suggestions of the Obesity Working Group to give calories increased prominence on the NFP, including increasing the font size for calories, providing a percent Daily Value for them, and eliminating the "calories from fat" listing to call more attention to the listing of total calories. These three changes would increase consumer awareness of the caloric content of packaged foods, potentially influencing people to eat less total calories. A percent Daily Value disclosure for calories per serving should help consumers be more cognizant of the amount of food they are eating and help them stay within an appropriate calorie range for their body mass per energy expended. A new "calories per serving" label on the front of packaged foods, such as the "starburst" design described by the FDA, could also be useful in reminding consumers that "calories count." It would be imperative, however, for such a label to indicate that the number of calories is per serving. The latter two words should be easily seen by consumers.

Since the fat recommendations in the Dietary Guidelines for Americans have changed from "low" total fat intake (1990) to "moderate" healthy fat intake (1995), the USCA does not believe it is necessary to list total calories from fat on the NFP today. The listing of total calories from fat next to total calories may detract from the latter, giving consumers the impression that calories from fat are more significant. In addition, the calories from fat listing may imply that all fat is bad, which goes against the recognition of healthy fats and related intake recommendations in the Dietary Guidelines. In the case of oils, which are comprised of fats, listing "calories from fat" is completely unnecessary in light of the listings of total calories and fat per serving.

More useful information on the NFP regarding fats is the types and amounts of fats, such as for unhealthy saturated and *trans* fats. Voluntary listing of the types and amounts of healthy fats, namely mono- and *cis* polyunsaturated fatty acids, is also useful for health-conscious consumers. The FDA may wish to consider mandatory listing of healthy fats on the NFP in the future to complement the current Dietary Guidelines and their minimum healthy fat intake recommendations.

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To ascertain that the listing of “calories from fat” is not necessary to help consumers maintain healthy dietary practices, the FDA could conduct focus group research with this listing removed. Consumers should be asked how they would use the various listings on the NFP, namely the calorie and fat listings. Focus group research would also be helpful in determining whether or not consumers would benefit from the listing (amount and percent Daily Value) of healthy fats.

The display of caloric content per package on the principal display panel (PDP) or better display of calories per serving on the NFP may encourage more competition among food manufacturers based on the calorie content of food, resulting in repackaging and/or reformulation. This could be similar to the impact of low-carbohydrate diets in America on U.S. food packaging and formulation. However, with respect to oils, it is unlikely that the enhanced display of caloric content on either the NFP or PDP would impact competition among oil manufacturers as the amount of unhealthy saturated and *trans* fats is and will continue to be the major source of competition and reformulation within this food category. This is especially true today due to the impending 2006 *trans* fat labeling requirement in the United States.

Again, thank you for the opportunity to comment on this docket pertaining to food labeling.

Respectfully submitted,

John Hass, president
U.S. Canola Association